The following pages contain the detailed scoring for your company based on public information.

The following table represents a summary of your scores:

<table>
<thead>
<tr>
<th>Topic</th>
<th>Number of questions</th>
<th>% score based on public information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leadership, Governance and Organisation</td>
<td>10</td>
<td>5%</td>
</tr>
<tr>
<td>Risk Management</td>
<td>5</td>
<td>0%</td>
</tr>
<tr>
<td>Company Policy and Codes</td>
<td>12</td>
<td>0%</td>
</tr>
<tr>
<td>Training</td>
<td>5</td>
<td>0%</td>
</tr>
<tr>
<td>Personnel and Helplines</td>
<td>7</td>
<td>14.3%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>39</strong></td>
<td><strong>3.8%</strong></td>
</tr>
</tbody>
</table>

TI has found no evidence that the company is involved in offsets and has therefore removed the two relevant questions (A13a and A13b).
A1:  
Does the company publish a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company?

Score:

0

Comments:  
Based on public information, there is no readily available evidence that the company publishes a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company.

References:

Public:  
NA
A2:
Does the company’s Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company.

References:
Public:
NA
A3:
Does the company’s Chief Executive Officer demonstrate a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company’s Chief Executive Officer demonstrates a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure. TI notes that the Leadership section of the company website states that all Management participate in upholding the company’s commitment to civic and social responsibility. However, there is no further detail on the specific actions of individuals, including the CEO.

References:
Public:
TI notes:
Company Website: About Us – Leadership
‘Today’s leaders are the current stewards of Gordon Battelle’s vision. Many, including President & CEO Dr. Jeffrey Wadsworth, hold patents on scientific discovery, and all lead by example in personally participating in efforts reflecting Battelle’s commitment to setting a strong corporate example of civic and social responsibility.’
http://battelle.org/about-us/leadership/management
A4:
Does the company publish a statement of values or principles representing high standards of business conduct, including honesty, trust, transparency, openness, integrity and accountability?

Score:
1

Comments:
Based on public information, there is evidence that the company publishes a statement of values on its website, which includes honesty, integrity and accountability. However, it does not go into sufficient depth by explaining what the company means by such values and why they matter to the organisation.

References:
Public:
Company Website: About Us – Mission and Values
‘Our Core Values
Accountability: We are responsible for our decisions and actions.
Agility: We execute swiftly to deliver valuable solutions to our clients.
Courage: We manage risks and do what is right, even in the face of personal or professional adversity.
Integrity: We employ the highest ethical standards, demonstrating honesty and fairness in every decision and action.
Respect & Trust: We treat each other with dignity and equality to create a culture of inclusion and collaboration.’
http://battelle.org/about-us/mission-vision-values
A5:
Does the company belong to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company belongs to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption.

References:
Public:
NA
A6:
Has the company appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda.

References:

Public:
NA
A7:
Has the company appointed a person at a senior level within the company to have responsibility for implementing the company’s ethics and anti-corruption agenda, and who has a direct reporting line to the Board?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has appointed a person at a senior level within the company to have responsibility for implementing the company’s ethics and anti-corruption agenda. TI notes that the company website states that all members of management participate in setting an example of civic and social responsibility. However, no further information was found pertaining to specific actions by individuals and what is implemented within the company.

References:
Public:
TI notes:
Company Website: About Us – Leadership
‘Many, including President & CEO Dr. Jeffrey Wadsworth, hold patents on scientific discovery, and all lead by example in personally participating in efforts reflecting Battelle’s commitment to setting a strong corporate example of civic and social responsibility.’
http://battelle.org/about-us/leadership
A8:
Is there regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda?

Score:

0

Comments:
Based on public information, there is no readily available evidence that there is regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda.

References:
Public:
NA
A8(a):
Is there a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and evidence of improvement plans being implemented when issues are identified?

Score:
0

Comments:
Based on public information, there is no readily available evidence that there is a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and no evidence of improvement plans being implemented when issues are identified.

References:
Public:
NA
A9:
Does the company have a formal process for review and where appropriate update its policies and practices in response to actual or alleged instances of corruption?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a formal process for review and where appropriate updates its policies and practices in response to actual or alleged instances of corruption.

References:
Public:
NA
A9(a):
Does the company have a formal anti-corruption risk assessment procedure implemented enterprise-wide?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure implemented enterprise-wide.

References:
Public:
NA
A10:
Does the company have a formal anti-corruption risk assessment procedure for assessing proposed business decisions, with clear requirements on the circumstances under which such a procedure should be applied?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure for assessing proposed business decisions.

References:
Public:
NA
A11:
Does the company conduct due diligence that minimises corruption risk when selecting or reappointing its agents?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company conducts due diligence that minimises corruption risk when selecting or reappointing its agents.

References:
Public:
NA
A12:
Does the company have contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption.

References:
Public:
NA
A13:
Does the company make clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company makes clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance. TI notes that the company has a policy of ensuring full regulatory compliance in its business with suppliers. However, there are no further details on what this entails and how it is put into practice.

References:
Public:
TI notes:
Company Website: Doing Business With Us – Suppliers
‘Simultaneous Excellence
We even invented a phrase for it: “simultaneous excellence.” That means we expect our teams to deliver outstanding results that meet our clients’ critical needs; to serve with distinction – effectively, efficiently, and in full compliance with regulatory and client expectations; and to set an example of outstanding corporate citizenship and community service.’
http://www.battelle.org/doing-business-with-us/suppliers
A13(a):
Does the company explicitly address the corruption risks associated with offset contracting?

Score:
NA

Comments:
Based on public information, there is no readily available evidence that the company engages in offset contracting.

References:
Public:
NA
A13(b):
Does the company conduct due diligence that minimises corruption risk when selecting its offset partners and offset brokers?

Score:

NA

Comments:
Based on public information, there is no readily available evidence that the company engages in offset contracting.

References:
Public:
NA
A15:  
Does the company have an anti-corruption policy that prohibits corruption in its various forms?

Score: 0

Comments:  
Based on public information, there is no readily available evidence that the company has an anti-corruption policy that prohibits corruption in its various forms. TI notes that evidence suggests that the company has a code of conduct. However, it is not published on the company website and is only mentioned in the company’s Tax Returns Exemption Form.

References:  
Public:  
TI notes:  
Tax Returns Exemption Form (15/08/2013), p.2:  
‘BMI periodically distributes an ethical code of conduct training course that must be reviewed and signed by every employee. Training with respect to section 501(c)(3) compliance requirements, limitations and prohibitions, including improper private benefit and other conflict of interest-related matters is included in the ethical code of conduct training course that must be reviewed and signed by every employee.’

A16:
Is the anti-corruption policy explicitly one of zero tolerance?

Score:

0

Comments:
Based on public information, there is no readily available evidence of a zero-tolerance anti-corruption policy.

References:
Public:
NA
A17:
Is the company's anti-corruption policy easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has an anti-corruption policy that is easily accessible. TI notes that there is evidence that the company has a code of conduct. However, it is not published on the company website and is only mentioned in the company’s Tax Returns Exemption Form.

References:
Public:
TI notes:
Tax Returns Exemption Form (15/08/2013), p.2:
‘BMI periodically distributes an ethical code of conduct training course that must be reviewed and signed by every employee. Training with respect to section 501(c)(3) compliance requirements, limitations and prohibitions, including improper private benefit and other conflict of interest-related matters is included in the ethical code of conduct training course that must be reviewed and signed by every employee.’
A17(a):
Is the company’s anti-corruption policy easily understandable and clear to Board members, employees and third parties?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company’s anti-corruption policy is easily understandable to Board members, employees and third parties.

References:
Public:
NA
A18:
Does the anti-corruption policy explicitly apply to all employees and members of the Board?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company’s anti-corruption policy explicitly applies to all employees and members of the Board.

References:
Public:
NA
A20:
Does the company have a policy on potential conflicts of interest, and does it apply to both employees and board members?

Score:

0

Comments:
Based on public information, there is some evidence that the company has a policy on potential conflicts of interest within the Code of Conduct. However, the Code is not available publicly and therefore no specific information on the policy is accessible.

References:
Public:
TI notes:
Tax Returns Exemption Form (15/08/2013), p.2:
‘Each year, BMI uses a detailed conflict of interest certificate to obtain information from directors, officers and key employees. In addition, directors and officers periodically update lists of their affiliations with other entities. BMI periodically distributes an ethical code of conduct training course that must be reviewed and signed by every employee. Training with respect to section 501(c)(3) compliance requirements, limitations and prohibitions, including improper private benefit and other conflict of interest-related matters is included in the ethical code of conduct training course that must be reviewed and signed by every employee. BMI maintains an ethics hot-line for its staff for use with respect to any ethics-related matter, and also maintains a dedicated e-mail box for use with respect to section 501(c)(3) related matters. Matters reported or concerns raised by contact with the hot-line or through the e-mail box are given due consideration and investigated appropriately.’
A21:

Does the company have a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery?

Score:

0

Comments:

Based on public information, there is some evidence that the company may have a policy prohibiting ‘improper private benefit’. However, bribery or the giving or receiving of gifts are not mentioned explicitly. TI notes that the company’s Code of Conduct is not publicly available.

References:

Public:

TI notes:

Tax Returns Exemption Form (15/08/2013), p.2:

‘Each year, BMI uses a detailed conflict of interest certificate to obtain information from directors, officers and key employees. In addition, directors and officers periodically update lists of their affiliations with other entities. BMI periodically distributes an ethical code of conduct training course that must be reviewed and signed by every employee. Training with respect to section 501(c)(3) compliance requirements, limitations and prohibitions, including improper private benefit and other conflict of interest-related matters is included in the ethical code of conduct training course that must be reviewed and signed by every employee. BMI maintains an ethics hot-line for its staff for use with respect to any ethics-related matter, and also maintains a dedicated e-mail box for use with respect to section 501(c)(3) related matters. Matters reported or concerns raised by contact with the hot-line or through the e-mail box are given due consideration and investigated appropriately.’

A22:

Does the company’s anti-corruption policy include a statement on the giving and receipt of hospitality that ensures that such transactions are bona fide and not a subterfuge for bribery?

Score:

0

Comments:

Based on public information, there is no readily available evidence of a statement on the giving and receipt of hospitality that ensures that such transactions are bona fide and not a subterfuge for bribery.

References:

Public:
NA
A23:
Does the company have a policy that explicitly prohibits facilitation payments?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a policy that explicitly prohibits facilitation payments.

References:
Public:
NA
A24:
Does the company prohibit political contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent? Does the company record and publicly disclose all political contributions?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company prohibits political contributions, or regulates such contributions in order to prevent undue influence or other corrupt intent.

References:
Public:
NA
A25:
Does the company have a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, and discloses the issues on which the company lobbies?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, or discloses the issues on which the company lobbies.

References:
Public:
NA
A25(a):
Does the company prohibit charitable contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company prohibits charitable contributions, or regulates such contributions in order to prevent undue influence or other corrupt intent.

References:
Public:
NA
A26:
Does the company provide written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company provides written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda.

References:
Public:
NA
A27:
Does the company have a training programme that explicitly covers anti-corruption?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a training programme that explicitly covers anti-corruption. TI notes that evidence suggests that the company provides training on its Code of Conduct, but limited information is provided and as a result it is unclear if it includes a specific anti-corruption module.

References:

Public:

TI notes:

Tax Returns Exemption Form (15/08/2013), p.2:

‘Each year, BMI uses a detailed conflict of interest certificate to obtain information from directors, officers and key employees. In addition, directors and officers periodically update lists of their affiliations with other entities. BMI periodically distributes an ethical code of conduct training course that must be reviewed and signed by every employee. Training with respect to section 501(c)(3) compliance requirements, limitations and prohibitions, including improper private benefit and other conflict of interest-related matters is included in the ethical code of conduct training course that must be reviewed and signed by every employee. BMI maintains an ethics hot-line for its staff for use with respect to any ethics-related matter, and also maintains a dedicated e-mail box for use with respect to section 501(c)(3) related matters. Matters reported or concerns raised by contact with the hot-line or through the e-mail box are given due consideration and investigated appropriately.’

A28:
Is anti-corruption training provided in all countries where the company operates or has company sites?

Score:

0

Comments:
Based on public information, there is no readily available evidence that anti-corruption training is provided in all countries where the company operates or has company sites.

References:
Public:
NA
A29:
Does the company provide targeted anti-corruption training to members of the Board?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company provides targeted anti-corruption training to members of the Board.

References:
Public:
NA
A30:
Does the company provide tailored ethics and anti-corruption training for employees in sensitive positions?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company provides tailored ethics and anti-corruption training for employees in sensitive positions.

References:

Public:
NA
A31:
Does the company have a clear and formal process by which employees declare conflicts of interest?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a clear and formal process by which employees declare conflicts of interest. TI notes that directors, officers and key employees complete annual conflicts of interest certificates. However, there is no evidence detailing the disclosure procedure for all employees.

References:
Public:
TI notes:
Tax Returns Exemption Form (15/08/2013), p.2:
‘Each year, BMI uses a detailed conflict of interest certificate to obtain information from directors, officers and key employees. In addition, directors and officers periodically update lists of their affiliations with other entities. BMI periodically distributes an ethical code of conduct training course that must be reviewed and signed by every employee. Training with respect to section 501(c)(3) compliance requirements, limitations and prohibitions, including improper private benefit and other conflict of interest-related matters is included in the ethical code of conduct training course that must be reviewed and signed by every employee. BMI maintains an ethics hot-line for its staff for use with respect to any ethics-related matter, and also maintains a dedicated e-mail box for use with respect to section 501(c)(3) related matters. Matters reported or concerns raised by contact with the hot-line or through the e-mail box are given due consideration and investigated appropriately.’
A32: 
Is the company explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company is explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities.

References:
Public:
NA
A33:
Does the company have multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee (e.g. web, phone, in person), to report concerns or instances of suspected corrupt activity?

Score:

1

Comments:
Based on public information, there is evidence that the company has a hotline that is open to report concerns surrounding ethics. However, it is not clear whether employees would be guaranteed anonymity or confidentiality when using this. Therefore the company scores 1. It is unclear if a dedicated email for 501(c)(3) related matters can be used to report instances of corrupt activity.

References:
Public:
Company Website: About Us – Mission and Values
‘If you have an ethics concern, please report it to our hotline: 614.424.4111’
http://battelle.org/about-us/mission-vision-values

Tax Returns Exemption Form (15/08/2013), p.2:
‘BMI maintains an ethics hot-line for its staff for use with respect to any ethics-related matter, and also maintains a dedicated e-mail box for use with respect to section 501(c)(3) related matters. Matters reported or concerns raised by contact with the hot-line or through the e-mail box are given due consideration and investigated appropriately.’
A33(a): Are the whistleblowing channels available to all employees in all geographies?

Score:

1

Comments:
Based on public information, there is evidence that across geographies employees have access to the Battelle Business Ethics and Employee Concerns Hotline. It is unclear if a dedicated email for 501(c)(3) related matters can be used to report instances of corrupt activity. The company therefore scores 1. To score higher the company would need to provide evidence that across geographies, all employees have access to more than one reporting channel.

References:

Public:
Company Website: About Us – Mission and Values
‘If you have an ethics concern, please report it to our hotline: 614.424.4111’
http://battelle.org/about-us/mission-vision-values

Company website: Battelle The Business of Innovation
‘Overview
The process for reporting a concern is simple:
1. First, tell us what happened. You will be asked a series of questions regarding your concern.
2. Next, tell us how we can contact you regarding this concern. If you do not want to provide your name, we can communicate with you through this website.
3. When you submit your report, you will be given a Report Number and a Personal Identification Number (PIN) and instructions for using this website to follow up on your report.’

Battelle Business Ethics and Employee Concerns Hotline:
Welcome. Thank you for taking the time to come forward with your concern. Battelle has provided this website for you to report unethical behavior and policy violations securely and confidentially. Your willingness to come forward is important to us.
What would you like to do?
► Report a Concern
► Follow Up on a Reported Concern

This website is operated by Global Compliance, a third-party provider. This is not an emergency service.

https://battelle.alertline.com/gcs/overview

Tax Returns Exemption Form (15/08/2013), p.2:

‘BMI maintains an ethics hot-line for its staff for use with respect to any ethics-related matter, and also maintains a dedicated e-mail box for use with respect to section 501(c)(3) related matters. Matters reported or concerns raised by contact with the hot-line or through the e-mail box are given due consideration and investigated appropriately.’

A33(b):

Does the company have formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively.

References:

Public:
NA
A34:

Does the company have well-publicised resources available to all employees where help and advice can be sought on corruption-related issues?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has well-publicised resources available to all employees where help and advice can be sought on corruption-related issues.

References:

Public:

NA
A35:
Is there a commitment to non-retaliation for bona fide reporting of corruption?

Score:

0

Comments:
Based on public information, there is no readily available evidence that there is a commitment to non-retaliation for bona fide reporting of corruption.

References:

Public:
NA
Information Sources:

Company Website:
http://battelle.org/

About Us – Mission and Values:
http://battelle.org/about-us/mission-vision-values

Battelle Business Ethics and Employee Concerns Hotline
https://battelle.alertline.com/gcs/overview

Tax Returns Exemption Form, 15/08/2013: